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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THE UNITED STATES OF AMERICA, ex
rel. Donald Palmer, §
Plaintiff, §
vs. §
C&D Technologies, Inc §
Defendant. §
§ Docket No. 12-907 (GEP)

**STIPULATION OF PLAINTIFF DONALD PALMER AND DEFENDANT C&D
TECHNOLOGIES, INC. SUR SATISFACTION OF JUDGMENT**

Plaintiff Donald Palmer (elator and Defendant C&D Technologies, Inc. (&D , through their counsel, hereby stipulate and agree:

WHEREAS, the Court entered an Order, dated May 23, 2017, that was entered of record on May 24, 2017 (the "Order" (Docket No. 148);

WHEREAS, via paragraphs nos. 2 and 3 of the Order, the Court entered Judgment in favor of Relator and against C&D in the amount of \$1,959,012.46 in attorneys fees and costs;

WHEREAS, via paragraph no. 3 of the Order, the Court entered Judgment in favor or the United States and against C&D in the amount of \$1,700,000.00 less any amount already paid, plus interest from May 6, 2016.

WHEREAS, Relator has appealed the Order with respect to the award of attorneys fees

and costs;

WHEREAS, C&D has paid the full amount of the Judgment for attorneys fees and costs set forth in paragraphs no. 2 and 3 of the Order to counsel for the Relator;

WHEREAS, C&D has paid the full amount of the Judgment set forth in paragraph no. 3 of the Order to the Civil Division of the United States Department of Justice;

WHEREAS, the Relator and C&D stipulate and agree that satisfaction of the Judgment for attorneys fees and costs set forth in paragraph nos. 2 and 3 of the Order is without prejudice to the rights of the Relator to pursue his appeal of the Order.

NOW, THEREFORE, the Clerk of the United States District Court for the Eastern District of Pennsylvania is hereby authorized and directed by plaintiff Donald Palmer to satisfy, cancel, and discharge the Judgment pertaining to attorneys fees and costs entered pursuant to paragraphs nos. 2 and 3 of the Court Order, entered on May 24, 2017.

Dated: October 3, 2017

/s/ Marc M. Orlow

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